

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GILBERTO FELIX HIDALGO

DEBTOR

CASE NO. 20-01784/MCF

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S MOTION TO DISMISS,  
DOCKET NO. 47 AND REQUEST TO EXTENSION OF TIME  
TO PAY BALANCE ON ARREARS**

TO THE HONORABLE COURT:

**NOW COMES, GILBERTO FELIX HIDALGO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 11, 2023, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 47, stating that the Debtor has defaulted in his Plan payments in the sum of \$2,760.00.

2. The Debtor hereby respectfully states that on November 13, 2023 the Debtor made one payment to the Trustee in the sum of \$690.00. Attached is copy of the *Trustee's Financial Summary* as evidence of said payment made by the Debtor on November 13, 2023.

3. In addition, on December 13, 2023 the Debtor sent to the Trustee via certified mail no. 9589071052701245070541, two (2) payments of (\$690.00) for a total amount of \$1,390.00. Attached is evidence of money orders no's. 28976528158 and 28976528160 to evidence said payments.

4. Notwithstanding, the Debtor is still in arrears in the sum of \$1,380.00 or two (2) payments.

5. The Debtor respectfully submits to this Honorable Court that he needs thirty (30) days to obtain the monies to cure the balance in the Plan arrears (\$1,380.00) and inform the Court accordingly . This extension of time to expire on January 12, 2024.

**WHEREFORE**, the Debtor, through his undersigned attorney respectfully requests this Honorable Court grant the present motion and grant the requested extension of time, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which sill send notice of same to: the Chapter 13 Trustee, Jose R. Carrion, Esq.; I also certify that a copy of this motion was sent via US Mail to the Debtor Gilberto Felix Hidalgo, El Seniorial Mail Station Box 613, San Juan PR 00926.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, this 13<sup>th</sup> day of December, 2023.

**/s/ Roberto Figueroa Carrasquillo**  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787- 744-7699/787-963-7699  
Email: [rfc@rfigueroalaw.com](mailto:rfc@rfigueroalaw.com)

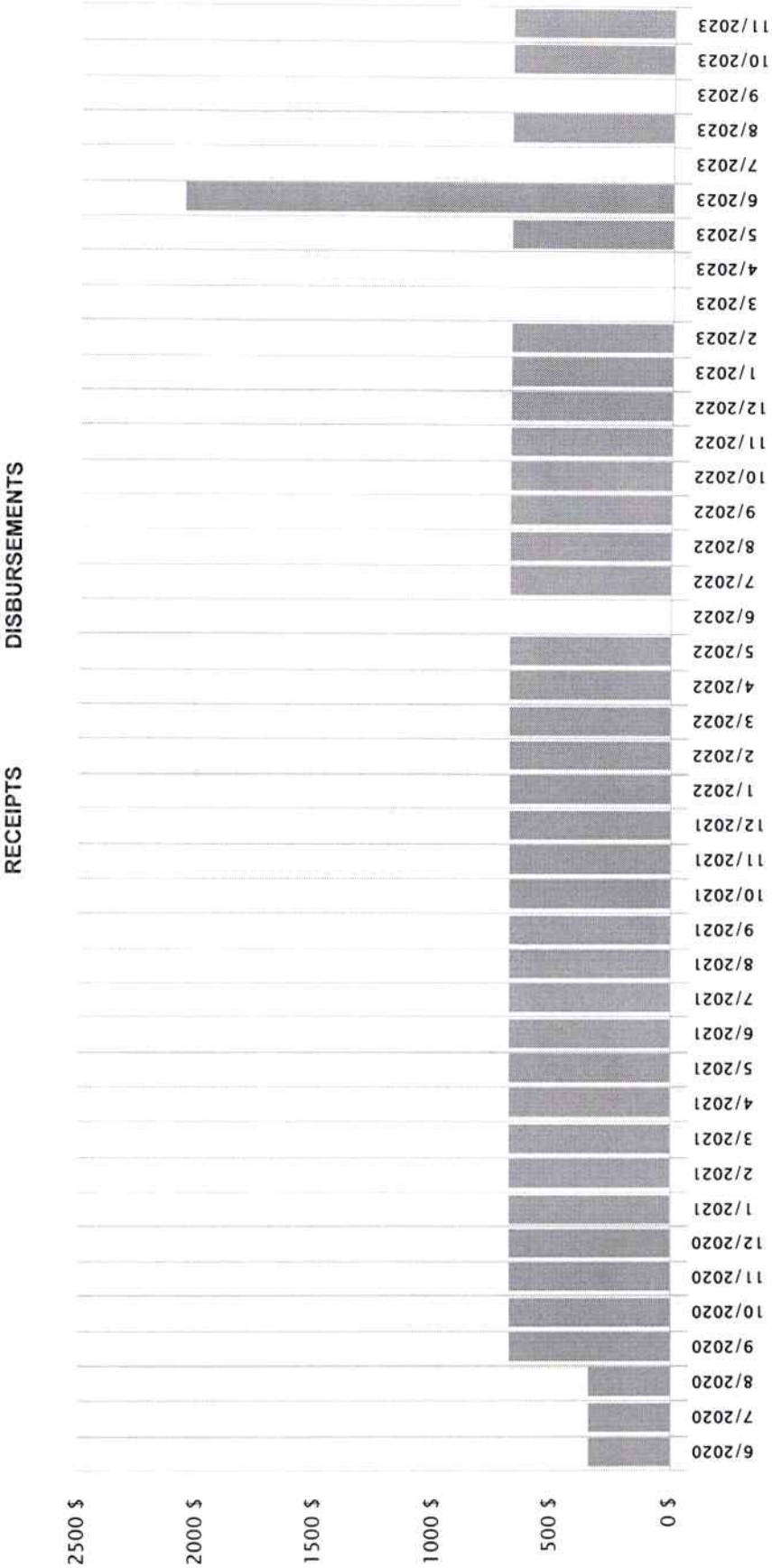
Account Ledger



Case 2001784 Debtor1 GILBERTO FELIX HIDALGO Trustee CARRION, JOSE RAMON (OLD SAN JUAN, PR)

Filter By All Claims All Payees Receipts All Time

Receipts & Disbursements



| DATE PAID  | CLAIM NUMBER | CHECK NUMBER | NAME OF PARTY | DESCRIPTION               | AMOUNT    |
|------------|--------------|--------------|---------------|---------------------------|-----------|
| 11/13/2023 |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 10/13/2023 |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 09/29/2023 |              |              | N/A           | EPAY NSF LINKING          | -\$690.00 |

| DATE PAID<br>▼ | CLAIM NUMBER | CHECK NUMBER | NAME OF PARTY | DESCRIPTION               | AMOUNT    |
|----------------|--------------|--------------|---------------|---------------------------|-----------|
| 09/26/2023     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 08/09/2023     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 06/08/2023     |              |              | N/A           | EPAY-DELINQUENCY PAYMENT  | \$2070.00 |
| 05/08/2023     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 04/20/2023     |              |              | N/A           | EPAY NSF LINKING          | -\$690.00 |
| 04/17/2023     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 02/27/2023     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 01/30/2023     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 12/15/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 11/17/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 10/14/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 09/13/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 08/12/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 07/13/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 05/13/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 04/13/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 03/14/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 02/14/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 01/12/2022     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 12/13/2021     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |
| 11/15/2021     |              |              | N/A           | EPAY-REGULAR PLAN PAYMENT | \$690.00  |

| DATE PAID<br>▼ | CLAIM NUMB<br>R | CHECK NUMB<br>ER | NAME OF PARTY | DESCRIPTION                  | AMOUNT   |
|----------------|-----------------|------------------|---------------|------------------------------|----------|
| 10/21/2021     |                 |                  | N/A           | TFS -MONTHLY PLAY PAYMENT    | \$690.00 |
| 09/13/2021     |                 |                  | N/A           | EPAY-REGULAR PLAN PAYMENT    | \$690.00 |
| 08/12/2021     |                 |                  | N/A           | EPAY-REGULAR PLAN PAYMENT    | \$690.00 |
| 07/12/2021     |                 |                  | N/A           | EPAY-REGULAR PLAN PAYMENT    | \$690.00 |
| 06/11/2021     |                 |                  | N/A           | EPAY-REGULAR PLAN PAYMENT    | \$690.00 |
| 05/18/2021     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 04/19/2021     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 03/18/2021     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 02/19/2021     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 01/25/2021     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 12/18/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 11/19/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 10/20/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 09/18/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$690.00 |
| 08/18/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$350.00 |
| 07/20/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$350.00 |
| 06/18/2020     |                 |                  | N/A           | TFS - NATIONWIDE TFS RECEIPT | \$350.00 |

Receipts: \$27,270.00



9589 0710 5270 1245 0705 41

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Chicago IL 60680

|  |        |
|--|--------|
| Certified Mail Fee   | \$4.35 |
| Extra Services & Fees (check box, add fee as appropriate)    |        |
| <input type="checkbox"/> Return Receipt (hardcopy)           | \$0.00 |
| <input type="checkbox"/> Return Receipt (electronic)         | \$0.00 |
| <input type="checkbox"/> Certified Mail Restricted Delivery  | \$0.00 |
| <input type="checkbox"/> Adult Signature Required            | \$0.00 |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 |

Postage \$0.66  
Total Postage and Fees \$8.56

Sent To *Jose R. Canino*  
Street and Apt. No., or PO Box No. *Chapter 13 Trustee P.O. Box 93109*  
City, State, ZIP+4® *Chicago IL 60680-1109*

Postmark Here

12/13/2023

|   |   |  |                      |
|---|---|--|----------------------|
| <b>UNITED STATES<br/>POSTAL SERVICE®</b>  |   | <b>CUSTOMER'S RECEIPT</b>                |                      |
| SEE BACK OF THIS RECEIPT<br>FOR IMPORTANT CLAIM<br>INFORMATION<br><b>NOT<br/>NEGOTIABLE</b> | Pay to<br><i>Jose R. Canino</i>   | KEEP THIS<br>RECEIPT FOR<br>YOUR RECORDS |                      |
|   | Address<br><i>Chapter 13 Trustee P.O. Box 93109<br/>Chicago, IL 60680-1109 2023 Dec 13 Canino</i> | Year, Month, Day<br>2023-12-13           | Amount<br>\$1,000.00 |
|   | Serial Number<br><b>28976528158</b>   | Post Office<br>007251                    | Clerk<br>9           |

|   |  |  |                    |
|---|--|--|--------------------|
| <b>UNITED STATES<br/>POSTAL SERVICE®</b>  |  | <b>CUSTOMER'S RECEIPT</b>                |                    |
| SEE BACK OF THIS RECEIPT<br>FOR IMPORTANT CLAIM<br>INFORMATION<br><b>NOT<br/>NEGOTIABLE</b> | Pay to<br><i>Jose R. Canino</i>  | KEEP THIS<br>RECEIPT FOR<br>YOUR RECORDS |                    |
|   | Address<br><i>Chapter 13 Trustee P.O. Box 93109<br/>Chicago, IL 60680-1109</i> | Year, Month, Day<br>2023-12-13           | Amount<br>\$380.00 |
|   | Serial Number<br><b>28976528160</b>  | Post Office<br>007251                    | Clerk<br>9         |